

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRINITY BUI and TRINITY FINANCING
INVESTMENTS CORPORATION,

Plaintiff,

—against—

INDUSTRIAL ENTERPRISES OF AMERICA INC.,
BECKSTEAD AND WATTS, LLP,
JOHN MAZZUTO, JAMES MARGULIES,
DENNIS O'NEILL, and JORGE YEPES,

Defendants.
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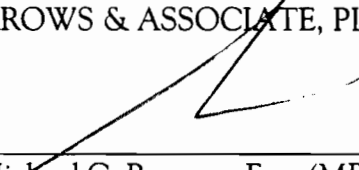
Case No.: 08 CV 0583 (VM)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed affirmation of Michael C. Barrows, Esq, affirmed in March 19, 2008, and upon all the exhibits attached thereto, and the pleadings herein, plaintiffs will move this Court at the United States Courthouse located at 500 Pearl Street, New York, New York 10007, before Judge Victor Marrero, United States District Judge, on April 5, 2008 at 9:30 a.m. or as soon thereafter as counsel may be heard, for an order pursuant to Rule 55 of the Federal Rules of Civil Procedure granting a default judgment as to liability against defendants, INDUSTRIAL ENTERPRISES OF AMERICA INC. and BECKSTEAD AND WATTS, LLP, awarding \$1,991,329.19 on plaintiffs' first cause of action plus New York statutory interest in an amount of 9 percent per annum from November 6, 2007, awarding damages on the remaining causes of action as determined at Inquest, granting plaintiffs the costs and disbursements of this action, and such other and further relief as this Court deems just and proper.

Dated: New York, New York
March 19, 2008

BARROWS & ASSOCIATE, PLLC.

By: 
Michael C. Barrows, Esq. (MB 5416)
330 Madison Ave., 6th floor
New York, NY 10017
Tel. (212) 573-0979
Fax. (212) 573-0983

Of Counsel

Leon B. Borstein, Esq.
420 Lexington Ave., Suite 2920
New York, NY 10170
Tel. (212) 687-1600
Fax. (212) 687-8710

